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15 *Attorneys for Debtors and Reorganized Debtors*

16 **UNITED STATES BANKRUPTCY COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re:**

Case Nos. 19-30088 (DM)

20 **PG&E CORPORATION,**

(Lead Case) (Jointly Administered)

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC**
23 **COMPANY,**

DECLARATION OF ANGELA FERRANTE
IN SUPPORT OF REORGANIZED
DEBTORS' THIRTY FOURTH SECURITIES
CLAIMS OMNIBUS OBJECTION TO
CLAIMS ADOPTING RKS ALLEGATIONS

24 **Debtors.**

- 25 Affects PG&E Corporation
26 Affects Pacific Gas and Electric
Company
27 Affects both Debtors

28 * *ALL PAPERS SHALL BE FILED IN THE*
LEAD CASE, NO. 19-30088 (DM)

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of
4 Kroll Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for
5 purposes of this Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible
6 for all business operations including but not limited to securities claims noticing and
7 administration.

8 2. I am providing this Declaration in support of the *Reorganized Debtors’ Thirty*
9 *Fourth Securities Claims Omnibus Objection To Claims Adopting RKS Allegations* (the
10 “**Omnibus Objection**”), filed contemporaneously herewith in the chapter 11 cases (the “**Chapter**
11 **11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors and
12 reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable).¹

13 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
14 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed
15 in the Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative
16 fields. I have personally overseen the administration of some of the most complex class action,
17 regulatory and bankruptcy administrations in the country.

18 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based
19 upon my personal knowledge, the knowledge of other employees working under and alongside me
20 on this matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized
21 Debtors’ various advisors and counsel, and my review of relevant documents and information. If
22 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
23 authorized to submit this Declaration on behalf of the Reorganized Debtors.

24 5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
25 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed
26 in the Chapter 11 Cases and identifying claims to be included in omnibus objections, including the

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
in the Omnibus Objection.

